

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DAVID TOM, individually and on behalf of  
all others similarly situated

Plaintiffs,

v.

PREMIER HOME SOLUTIONS, LLC

Defendants.

Case No.: **1:24-CV-13195-WGY**

**MOTION FOR ENLARGEMENT OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff David Tom, individually and on behalf of all others similarly situated, hereby respectfully file this motion for an order under Fed. R. Civ. P. 6(b), extending Defendant Premier Home Solutions, LLC's time to file an answer or response to the Complaint – Class Action and Jury Demand ("Complaint") by 45 days. *See* ECF No. 1. In support of this motion, Plaintiff states:

1. On December 30, 2024, Plaintiff filed the Complaint in the above-captioned matter. *See id.* On January 27, 2025, Plaintiff effectuated service on Defendant.

2. Defendant's responsive pleading is currently due on February 17, 2024. Fed. R. Civ. P. 12(a)(4)(A). Defendant, however, through counsel, Michael E. Strauss, Esq. (*pro hac vice* forthcoming) has contacted undersigned counsel to advise it requires additional time to retain local counsel and prepare and file a response.

3. For the foregoing reasons, on behalf of Defendant and with the assent of Defendant's counsel pursuant to Local Rule 7.1(A)(2), respectfully requests the Court issue an

order enlarging the deadline to file a response to the Complaint by 45 days. Under the extension, the Defendant's responsive pleading would now be due April 3, 2025.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff David Tom, individually and on behalf of all others similarly situated, respectfully requests the Court:

- A. Grant this Motion for Enlargement of Time to Answer or Otherwise Respond to the Complaint;
- B. Extend the responsive pleading deadline by 45-days from February 17, 2025 to April 3, 2025; and
- C. Grant such other and further relief as is just and equitable.

Respectfully submitted,

DAVID TOM, individually and on behalf of  
all others similarly situated,

By his attorney,

Dated: February 14, 2024

/s/ Anthony I. Paronich

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Attorney for Plaintiff

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I hereby certify, pursuant to Rule 7.1(A)(2) of the Local Rules of the United States District Court for the District of Massachusetts, that I conferred with Defendant's counsel, Michael E. Strauss, Esq. (pro hac vice forthcoming) regarding this motion. Attorney Strauss, on behalf of

Defendant, advised that he assents to the relief requested herein.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this pleading was served on Defendant and Defendant's counsel via email at michael@strauss.law.

Dated: February 14, 2025

/s/ Anthony I. Paronich  
Anthony I. Paronich